

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	Case No:	18-25796
Deborah Davis)		
Debtor,)	Chapter:	Chapter 13
)		
)	Judge:	A. Benjamin Goldgar

NOTICE OF HEARING

To: Deborah Davis, 16343 Woodlawn East Ave., South Holland, IL, 60473
Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604
Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604
Internal Revenue Service, PO Box 7346, Philadelphia, PA 19101
Internal Revenue Service Mail Stop CH1 230 S. Dearborn, Chicago, IL 60604
Attorney General of the United States Tax Division (DOJ) PO Box 55 Ben Franklin Station, Washington, DC 20530
Civil Process Clerk, Office of the United States Attorney for the Northern District of Illinois, 219 S. Dearborn, 5th Floor, Chicago, IL 60604

PLEASE TAKE NOTICE that on the 27th of November, 2018 at 9:30 a.m., I shall appear before the Honorable Judge A. Benjamin Goldgar in 219 S. Dearborn St., Courtroom 642, Chicago, IL and then and there present the attached **OBJECTION TO THE CLAIM OF THE INTERNAL REVENUE SERVICE**, a copy of which is attached hereto.

By: /s/ David Kosk
David Kosk

CERTIFICATE OF SERVICE

I, David Kosk, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, at 55 E. Monroe, Suite 3400, Chicago, Illinois, before the hour of 5:30 p.m., on October 20, 2018.

By: /s/ David Kosk
David Kosk

Attorneys for the Debtor

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960

Capitalone
Attn: Bankruptcy Dept.
15000 Capital One Dr
Richmond VA 23238

RISE CREDIT OF ILLINOIS LLC D/
C/O National Credit Adjust
327 W 4Th Ave
Hutchinson KS 67501

Chase CARD
Attn: Bankruptcy Dept.
Po Box 15298
Wilmington DE 19850

Citi Mortgage
Bankruptcy Department
PO Box 8004
South Hackensack NJ 07606

Codilis & Associates, PC
Bankruptcy Dept.
15W030 N. Frontage Rd. #100
Burr Ridge IL 60527

Clerk, Chancery
Bankruptcy Dept.
50 W. Washington St., Room 802
Chicago IL 60602

Comenitybank/Wayfair
Attn: Bankruptcy Dept.
Po Box 182789
Columbus OH 43218

IRS Priority Debt
Bankruptcy Dept.
PO Box 7346
Philadelphia PA 19101

Lendup CARD Services I
Attn: Bankruptcy Dept.
225 Bush St Ste 1100
San Francisco CA 94104

Midstate Collection SO
Attn: Bankruptcy Dept.
Po Box 3292
Champaign IL 61826

Onemain
Attn: Bankruptcy Dept.
Po Box 1010
Evansville IN 47706

Personify
PO Box 500650
San Diego CA 92150

Republic BANK Trust CO
C/O NCB Management Service
1 Allied Dr
Trevoise PA 19053

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OBJECTION TO THE CLAIM OF THE INTERNAL REVENUE SERVICE

NOW COMES the Debtor, Ms. Deborah Davis (the "Debtor"), by and through her attorneys, Geraci Law, LLC, to present her **OBJECTION TO THE CLAIM OF THE INTERNAL REVENUE SERVICE**, and states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 09/13/2018.
3. On 09/19/2018, the Internal Revenue Service (hereinafter the "Creditor") filed a proof of claim (number 1-1) in the amount of \$14,158.93. (See attached Exhibit A.)
4. Claim 1-1 alleges \$2,380.00 priority tax debt and \$283.19 interest based on a filed tax return for the tax period ending 12/31/2015, and \$11,175.40 priority tax debt and \$233.56 interest based on an unfiled return for the tax period ending 12/31/2017.
5. The Debtor in fact did file a return for the tax period ending 12/31/2017 and owes \$7,170. (See attached Exhibit B.)

6. The priority portion of claim 1-1 is determined to be
\$9,833.19.
7. Debtor respectfully requests this Honorable Court to sustain
Debtor's objection to claim of the Internal Revenue Service.

WHEREFORE, the Debtor, Ms. Deborah Davis, prays that this Court
enter an order:

1. Sustaining Debtor's objection to claim of the Internal
Revenue Service,
2. Determining that the Internal Revenue Service has a priority
claim in the amount of \$9,833.19, and
3. Any such further additional relief that this Court may deem
just and proper.

/s/ David Kosk

David Kosk

Attorneys for the Debtor

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960